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9 UNITED STATES DISTRICT COURT
10 FOR THE NORTHERN DISTRICT OF CALIFORNIA
11

12 FRANK SANTOS, DIANE QUALLS, and
13 REBECCA JOHNSON, on behalf of themselves
and all others similarly situated,
14 Plaintiffs,

15 v.

16 COUNTY OF ALAMEDA, BOARD OF
SUPERVISORS OF ALAMEDA COUNTY,
17 ALAMEDA COUNTY SOCIAL SERVICES
AGENCY, and CHET HEWITT, in his official
18 capacity as Director of the Alameda County
Social Services Agency; and DOES 1-10,
19 inclusive,
20 Defendants.

Case No.: C04-02725 (JCS)

STIPULATION AND ORDER RE
ATTORNEYS' FEES AND COSTS

21 IT IS HEREBY STIPULATED by the parties, through their respective attorneys of record,
22 that:

- 23 1. Plaintiffs have made a demand for reasonable attorneys' fees and costs to
24 defendants, and the parties have reached a mutually satisfactory resolution of plaintiffs' claim.
- 25 2. Defendants agree to pay plaintiffs the sum of \$465,000 as and for attorneys'
26 fees, costs, and expenses incurred by plaintiffs.
- 27 3. Defendants will pay the \$465,000 to the Disability Rights Advocates within 90
28 days of the date on which this Stipulation and Order is signed by the Judge.

1 4. In the event that defendants do not pay the \$465,000 within the 90 day period
2 described in paragraph 3 above, daily interest at the statutory rate [28 USCS §1961 (b)] will
3 begin to accrue on the principal amount beginning on the 91st day and continuing thereafter until
4 the principal amount is paid.

5 5. Upon payment of the \$465,000.00, plaintiffs will release defendants from all
6 liability for attorneys' fees, costs and expenses in connection with all litigation in this case,
7 including ongoing and continued meetings with the Joint Expert regarding implementation of the
8 settlement, except that after the Effective Date of this Stipulation and Order plaintiffs do not
9 release defendants from any potential liability for any attorneys' fees, costs and expenses
10 incurred; 1) after 30 days following the initiation of any Dispute Resolution Process or 2) in
11 connection with any legal action or motion brought by the plaintiffs to enforce the Settlement
12 Agreement or Stipulation Order, signed by the Court on October 5, 2005.

13 6. The Court may enter the following order, approving the terms of this Stipulation
14 and directing the parties to comply with its terms.

15 7. This Stipulation may be signed in counterparts and facsimile signatures may be
16 submitted in lieu of originals.

17 8. The Effective Date of this Stipulation and Order is the date that this Order is
18 signed by the Judge.

19
20 IT IS SO STIPULATED:

21
22 DATED: October 31, 2006

RICHARD E. WINNIE, County Counsel in and for
the County of Alameda, State of California

23
24 By _____

RICHARD R. KARLSSON
Chief Assistant County Counsel

25 Attorney for County of Alameda
26
27
28

1 DATED: 11/6/06

DISABILITY RIGHTS ADVOCATES

2 By 
KEVIN KNESTRICK, Attorney

3 Attorney for Plaintiffs

4
5
6 DATED: 11/1/06

THE PUBLIC INTEREST LAW PROJECT

7 By 
STEPHEN RONFELDT, Attorney

8 Attorney for Plaintiffs

9
10
11 DATED: _____

WESTERN CENTER ON LAW AND POVERTY

12 By _____
13 ROBERT D. NEWMAN, Attorney

14 Attorney for Plaintiffs

15
16 DATED: _____

NATIONAL LAW CENTER ON HOMELESSNESS
AND POVERTY

17
18 By _____
CATHY BENDOR, Attorney

19 Attorney for Plaintiffs

20
21
22 ORDER

23 Good cause appearing from the foregoing Stipulation of the parties, IT IS ORDERED
24 that the parties comply with the terms of this Stipulation.

25
26 DATED: _____

27 UNITED STATES DISTRICT COURT JUDGE

1 DATED: _____

DISABILITY RIGHTS ADVOCATES

2 By _____
3 KEVIN KNESTRICK, Attorney

4 Attorney for Plaintiffs

5
6 DATED: _____

THE PUBLIC INTEREST LAW PROJECT

7 By _____
8 STEPHEN RONFELDT, Attorney

9 Attorney for Plaintiffs

10
11 DATED: November 2, 2006

WESTERN CENTER ON LAW AND POVERTY

12 By Robert D. Newman
13 ROBERT D. NEWMAN, Attorney

14 Attorney for Plaintiffs

15
16 DATED: _____

NATIONAL LAW CENTER ON HOMELESSNESS
AND POVERTY

18 By _____
19 CATHY BENDOR, Attorney

20 Attorney for Plaintiffs

21
22 ORDER

23 Good cause appearing from the foregoing Stipulation of the parties, IT IS ORDERED
24 that the parties comply with the terms of this Stipulation.

25
26 DATED: _____

27 UNITED STATES DISTRICT COURT JUDGE

1 DATED: _____

DISABILITY RIGHTS ADVOCATES

2 By _____
3 KEVIN KNESTRICK, Attorney

4 Attorney for Plaintiffs

5
6 DATED: _____

THE PUBLIC INTEREST LAW PROJECT

7 By _____
8 STEPHEN RONFELDT, Attorney

9 Attorney for Plaintiffs

10
11 DATED: _____

WESTERN CENTER ON LAW AND POVERTY

12 By _____
13 ROBERT D. NEWMAN, Attorney

14 Attorney for Plaintiffs

15
16 DATED: _____

NATIONAL LAW CENTER ON HOMELESSNESS
AND POVERTY

17
18 By Maria Foscari
19 CATHY BENDOR, Attorney
20 MARIA FOSCARINI
21 Attorney for Plaintiffs

22 ORDER

23 Good cause appearing from the foregoing Stipulation of the parties, IT IS ORDERED
24 that the parties comply with the terms of this Stipulation.

25
26 DATED: November 7, 2006

27 UNITED STATES JUDGE

